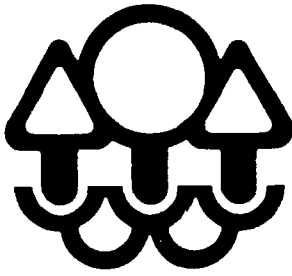




315299



Minnesota Pollution Control Agency

December 21, 1984

EXECUTIVE SUMMARY
National Steel Pellet Co.
MND071344733

Situation

National Steel Pellet Co., located in Keewatin, Minnesota, mines taconite and produces iron ore pellets. According to the 103C Notification, leaded gear lubricants were used on slow-moving highly-pressurized gears and bearings in a variety of equipment. The lubricant contained one percent to two percent lead. The spent lubricants were collected in barrels and disposed of on stockpiles of soil/rock removed from iron ore formations. The stockpiles are located on the Company's property.

There are several disposal sites on the property. The spent lubricants were codisposed with the stockpiled material. The Company indicated on the 103C Notification that the stockpiles were not located over any ore bodies, so there were no plans to move them in the future.

The Company used leaded lubricant until about 1980. They presently use primarily unleaded lubricant. Leaded lubricant is still used for the most sensitive gears and bearings. Waste leaded lubricant is collected, stored and shipped out-of-state for incineration. The Company indicated that the waste is not water soluble and lead does not leach out with an EP Toxicity test.

Inspection Priority Recommendation

There is a potential for contamination of ground water serving the town of Keewatin, therefore a medium potential hazard is recorded in Part 1, V of the Preliminary Assessment.

A low (pending) inspection priority is recorded in Part 1, V.01 of the Preliminary Assessment because the lubricants are mixed in with and/or covered by a hundred feet of soil/rock at each stockpile and is not water soluble.

Phone: _____

1935 West County Road B2, Roseville, Minnesota 55113-2785

Regional Offices • Duluth/Brainerd/Detroit Lakes/Marshall/Rochester

Equal Opportunity Employer



RECEIVED
APR 25 1984
MPCA — DULUTH
DULUTH, MN.

12
13
14
15
16
17
18
FILE



Preliminary Assessment



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
MN D071344733

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) National Steel Pellet Co.	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER R. 21 & 22 W., 3/4 Mi. NE
03 CITY Keewatin	04 STATE 05 ZIP CODE 06 COUNTY MN 55753 Itasca
07 COUNTY CODE 061	08 CONG DIST 08
09 COORDINATES LATITUDE ^{Various dumps located} 41° 23' to 25' 0" N these pages LONGITUDE 99° 09' 30" to 09° 10' 00" W	Nashuaux Quad (7 1/2') 1969
10 DIRECTIONS TO SITE (Starting from nearest public road) North of Keewatin about 1 mi. on Hwy. 169. Follow company road northeast to site.	

III. RESPONSIBLE PARTIES

01 OWNER (If known) Hanna Mining Co. (managed by)	02 STREET (Business, mailing, residential) 2125 Second Ave. East
03 CITY Hibbing	04 STATE 05 ZIP CODE 06 TELEPHONE NUMBER MN 55746 (218) 263-7521
07 OPERATOR (If known and different from owner) National Steel Pellet Co.	08 STREET (Business, mailing, residential) R. 21 & 22 W., 3/4 mi. NE
09 CITY Keewatin	10 STATE 11 ZIP CODE 12 TELEPHONE NUMBER MN 55753 (218) 778-6521
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN	
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3001 DATE RECEIVED: 08/18/80 MONTH DAY YEAR <input checked="" type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: 06/22/81 MONTH DAY YEAR <input type="checkbox"/> C. NONE	

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input type="checkbox"/> YES DATE _____ MONTH DAY YEAR <input checked="" type="checkbox"/> NO	BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): _____
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN	03 YEARS OF OPERATION BEGINNING YEAR 1967 ENDING YEAR currently operating
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED WASTE GEAR LUBRICANT (LEADED)	
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION GROUND WATER CONTAMINATION (population)	

V. PRIORITY ASSESSMENT Potential hazard: Medium

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input checked="" type="checkbox"/> C. LOW (pending) (Inspect on time available basis) <input type="checkbox"/> D. NONE (No further action needed, complete current disposition form)
--

VI. INFORMATION AVAILABLE FROM

01 CONTACT Tim Musick	02 OF (Agency/Organization)	03 TELEPHONE NUMBER ()
04 PERSON RESPONSIBLE FOR ASSESSMENT Tim Musick	05 AGENCY MPCA	06 ORGANIZATION DULUTH
07 TELEPHONE NUMBER 12181723-4660	08 DATE 12/21/84 MONTH DAY YEAR	



EPA FORM 2070-12 (7-81)



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
MN D071344733

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: 1443

02 ☐ OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

☒ POTENTIAL

☐ ALLEGED

City of Keewatin

01 ☐ B. SURFACE WATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED:

02 ☐ OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

No known surface water intakes within 2 miles.

01 ☐ C. CONTAMINATION OF AIR

03 POPULATION POTENTIALLY AFFECTED:

02 ☐ OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

N/A

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS

03 POPULATION POTENTIALLY AFFECTED:

02 ☐ OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

N/A

01 ☐ E. DIRECT CONTACT

03 POPULATION POTENTIALLY AFFECTED:

02 ☐ OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

N/A

01 ☒ F. CONTAMINATION OF SOIL

03 AREA POTENTIALLY AFFECTED: unknown
(Acres)

02 ☐ OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☒ ALLEGED

LEADED WASTE LUBRICATING GEAR GREASE MIXED IN WITH WASTE
ROCK MATERIAL ON property

01 ☒ G. DRINKING WATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: 1443

02 ☐ OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

☒ POTENTIAL

☐ ALLEGED

See A - Groundwater contamination

01 ☐ H. WORKER EXPOSURE/INJURY

03 WORKERS POTENTIALLY AFFECTED:

02 ☐ OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

N/A

01 ☐ I. POPULATION EXPOSURE/INJURY

03 POPULATION POTENTIALLY AFFECTED:

02 ☐ OBSERVED (DATE:)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

N/A



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

MN D071344733

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

N/A

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION (Include name(s) of species)

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

N/A

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

N/A

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES
(Spills/runoff/standing liquids/leaking drums)

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

N/A

01 ☒ N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☒ POTENTIAL

☐ ALLEGED

VIA LEACHATE RUNOFF / GROUNDWATER CONTAMINATION

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

N/A

01 ☒ P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☒ ALLEGED

DUMPED IN WASTE ROCK PILES

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

NONE

III. TOTAL POPULATION POTENTIALLY AFFECTED: 1443

IV. COMMENTS

Company representative indicated lubricant waste is not water soluble, EPTox test did not occasion any leaching of lead.

V. SOURCES OF INFORMATION (Cite specific references, e. g., state files, sample analysis, reports)

MPCA files

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

General Information

The Potential Hazardous Waste Site, Preliminary Assessment form is used to record information necessary to make an initial evaluation of the potential risk posed by a site and to recommend further action.

The Preliminary Assessment form contains three parts:

Part 1 — Site Information and Assessment

Part 2 — Waste Information

Part 3 — Description of Hazardous Conditions and Incidents

Part 1 — Site Information and Assessment contains all of the data elements also contained on the Site Identification form required to add a site to the automated Site Tracking System (STS). It is therefore possible to add a site to STS at the Preliminary Assessment stage. Instructions are given below.

Part 2 — Waste Information and Part 3 — Description of Hazardous Conditions and Incidents are used to record specific information about substances, amounts, hazards, and targets, e.g., population potentially affected, that are used in determining the priority for further action. Parts 2 and 3 are also contained in the Potential Hazardous Waste Site, Site Inspection Report form where they may be used to update, add, delete, or correct information supplied on the Preliminary Assessment.

An Appendix with feedstock names and CAS Numbers and the most frequently cited hazardous substances and CAS Numbers is located behind the instructions for the Preliminary Assessment.

General Instructions

1. Complete the Preliminary Assessment form as completely as possible.

2. Starred items (*) are required before assessment information can be added to STS. The system will not accept incomplete assessment information.

3. To add a site to STS at the Preliminary Assessment stage, write "New" across the top of the form and complete items II-01, 02, 03, 04, and 06, Site Name and Location, and item III-13, Type of Ownership.

4. Data items carried in STS, which are identical to those on the Site Identification form and which can be added, deleted, or changed using the Preliminary Assessment form, are indicated with a pound sign (#). To ensure that the proper action is taken, outline the item(s) to be added, deleted, or changed with a bright color and indicate the proper action with "A" (add), "D" (delete), or "C" (change).

5. There are two options available for adding, deleting, or changing information supplied on the Preliminary Assessment form. The first is to use a new Preliminary Assessment form, completing only those items to be added, deleted, or changed. Mark the form clearly, using "A", "D", or "C", to indicate the action to be taken. If only data carried in STS are to be altered, the Site Source Data Report may be used. Using the report, mark clearly the items to be changed and the action to be taken.

Detailed Instructions

Part 1 Site Information and Assessment

I. **Identification:** Identification (State and Site Number) is the site record key, or primary identifier, for the site. Site records in the STS are updated based on Identification. It is essential that State and Site Number are correctly entered on each form.

*I-01 State: Enter the two character alpha FIPS code for the state in which the site is located. It must be identical to State on the Site Identification form.

*I-02 Site Number: Enter the ten character alphanumeric code for sites which have a Dun and Bradstreet or EPA "user" Dun and Bradstreet number or the ten character numeric GSA identification code for federal sites. The Site Number must be identical to the Site Number on the Site Identification form.

II. **Site Name and Location:** If Site Name and Location information require no additions or changes, these items are not required on the Preliminary Assessment form. However, completing these items will facilitate use of the completed form and records management procedures.

#II-01 Site Name: Enter the legal, common, or descriptive name of the site.

#II-02 Site Street: Enter the street address and number (if appropriate) where the site is located. If the precise street address is unavailable for this site, enter brief direction identifier, e.g., NW intersection I-295 & US 99; Post Rd, 5 mi W of Rt. 5.

#II-03 Site City: Enter the city, town, village, or other municipality in which the site is located. If the site is not located in a municipality, enter the name of the municipality (or place) which is nearest the site or which most easily locates the site.

#II-04 Site State: Enter the two character alpha FIPS code for the state in which the site is located. The code must be the same as in item I-01.

#II-05 Site Zip Code: Enter the five character numeric zip code for the postal zone in which the site is located.

#II-06 Site County: Enter the name of the county, parish (Louisiana), or borough (Alaska) in which the site is located.

#II-07 County Code: Enter the three character numeric FIPS county code for the county, parish, or borough in which the site is located. (The regional data analyst will furnish this data item.)

#II-08 Site Congressional District: Enter the two character number for the congressional district in which the site is located.

II-09 Coordinates: Enter the Coordinates, Latitude and Longitude, of the site in degrees, minutes, seconds and tenths of seconds. If a tenth of a second is insignificant at this site, enter "0".

II-10 Directions to Site: Starting from the nearest public road, provide narrative directions to the site.

Division of Solid and Hazardous Waste
Site Response Section

Page 1 of 1

3012 File Memorandum

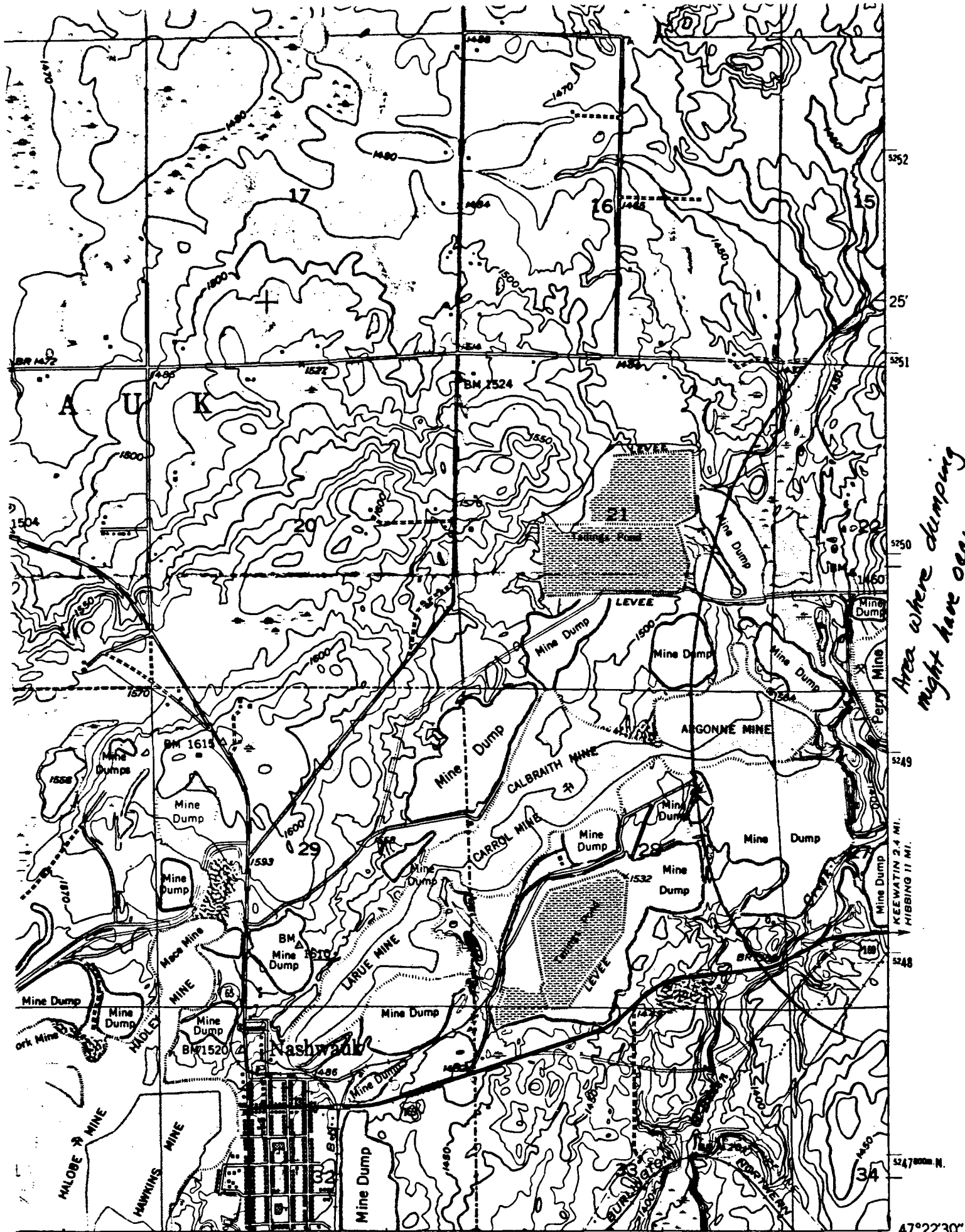
File/Site Name National Steel Pellet Co. I.D. No. MND071344733
Active _____ Investigator none Date • 1/11/85

SOURCES OF INFORMATION

Persons Contacted/Location/Phone No.	File Number(s)/Location
1) Donald Oss / Nat'l. Steel Pellet / 218-778-6521	
2)	
3)	
4)	
5)	

ADDITIONAL INFORMATION

1) Mr Oss explained that the company mines taconite and produces iron ore pellets. They no longer dump the lubricants in the surface stockpiles. They collect the "dipping" lubricant in drums and ship it out-of-state. They ship every few months to Ross Incineration in Ohio. [cost: \$9-10,000⁰⁰/truckload, \$3⁰⁰/loaded mile, \$100⁰⁰/barrel for incineration] They are using unleaded lubricants where can. The ~~lubricant~~ ~~the~~ lead in the lubricant ~~is~~ ~~is~~ liquified when it goes through the gears because of the extreme heat and pressure. Waste diluent, including solvents, evaporates so what is left is a thick, viscous, tarry substance. The substance is not water soluble; EP Tox tests show that the lead does not dissolve out; it cannot be recycled or reused because it picks up taconite fines. It can be filtered with solvents, but it is uneconomical to do so because it would require such large amounts.



Area where dumping might have occurred.